



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
REGIONAL COUNSEL, CENTRAL REGION (JACE)
1114 COMMERCE STREET
DALLAS, TEXAS 75242-0216

17 APR 1990

Ms. Mary Fulghum
Office of Regional Counsel
Environmental Protection Agency
230 S. Dearborn St.,
Chicago, Illinois 60604

Re: 6500 Industrial Highway Group v. K.A. Steel Co., Offutt AFB -
104(e) Response

Dear Ms. Fulghum

Enclosed is the following information in accordance with the referenced
104(e) request.

- Sub A. Correspondence from Mr. John Popelka to Mr. Thomas Curtis dated 4 Apr 1990;
- Sub B. EPA 104(e) request dated 30 Jan 1990;
- Sub C. Letter to Robert LeFevre (DOJ) from Capt Laura E. Carlan, Offutt AFB dated 22 Sep 1989;
- Sub D. Hazardous Waste Manifest dated 21 Mar 1985;
- Sub E. Hazardous Waste Manifest dated 28 Sep 1984;
- Sub F. Hazardous Waste Manifest dated 28 Sep 1984;
- Sub G. Alabama, State of, Hazardous Waste Manifest dated 06 Jan 1984;
- Sub H. Alabama Hazardous Waste Manifest dated 18 Oct 1982;
- Sub I. Hazardous Waste Manifest dated 06 June 1985;
- Sub J. Correspondence from Director of Environmental Protection, Defense Logistics Agency to Capt Albert Kline Offutt AFB, Nebraska;
- Sub K. Letter from John L. Popelka, P.E. to DRMS, Battle Creek, Michigan dated 4 Apr 1990.

Having examined the above-listed documentation in the ordinary course of business the answers to your questions are as follows:

Question 1:

John L. Popleka, P.E. (Offutt AFB, Nebraska)
Johnette Shockley (Offutt AFB)

Question 2:

See List of documents set forth in paragraph 1.

Question 3:

See correspondence of the Air Force dated 4 Apr 1990. It is possible that Mr. Roscoe Davis, Defense Reutilization and Marketing Service (DRMS), Battle Creek, Michigan at (616) 961-5922 may have additional information concerning this particular Site.

Question 4:

See the manifests specified in paragraph 1 for the actual identification numbers.

Question 5:

No evidence has been obtained by this office with regard to this particular question. If evidence does come to light concerning the acts or omissions of others, this evidence will be turned over to EPA.

Question 6:

Mr. John L. Popelka (Offutt), Ms. Johnette Shockley (Offutt).

Question 7:

No evidence has been found documenting that Offutt, used, purchased, stored, treated, disposed, transported or otherwise handled any hazardous substances or materials, including but not limited to the types of PCB identified in your question. Other than the PCBs identified in the attached manifests, nor was any evidence presented suggesting that it was stored, treated, disposed, or otherwise transported to the Site. See the referenced manifests attached to this response for documentation pertaining to the storage, treatment, disposal, and transport of PCB items from Offutt. Once DRMS accepted the PCB items for transport and disposal, Offutt received no further documentation concerning the end point disposal of those items, other than the end point designated in the manifest attached.

Question 8:

Not applicable.

Question 9:

Not applicable.

Question 10.

Not applicable.

Question 11.

Not applicable.

Question 12.

Not applicable.

Having examined these documents in the ordinary course of business, I believe the documents represent the totality of information available to Offutt AFB concerning the movement of PCB items off of the base. However, the United States Air Force understands that its' duty to supplement this 104(e) response in the event of newly discovered information is on-going in nature. The Air Force will, of course, update this response should new information become available. If you have any questions concerning the response please do not hesitate to call or otherwise contact me at (214) 653-3357.

Sincerely



THOMAS A. CURTIS
Deputy Regional Counsel

11 Atchs

1. Tom Curtis ltr
2. EPA 104(e) request
3. Ltr dated 22 Sep 89
4. Hazardous waste manifest (6)
5. Ltr - DLA
6. Ltr to DRMS

Cy to: 55 CSG/DEEV
(Ms. Johnette Shockley)
HQ/JACE
(Capt Terry McDivet)
DOJ (Bob LeFevre)



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 55 COMBAT SUPPORT GROUP (SAC)
OFFUTT AIR FORCE BASE, NEBRASKA 68113-5000

4 APR 1990

Mr Thomas Curtis
Deputy Regional Council
Air Force Regional Civil Engineer
AFRCE-CR/ROV
114 Commerce Street
Suite 206
Dallas, Texas 75242-0216

Dear Mr Curtis

Reference the EPA Region V Letter dated 30 Jan 90 (Atch 1) and 55 SRW/JA Ltr, 22 Sep 89 (Atch 2).

In response to your phone conversation with Ms Johnette Shockley on 29 Mar 90 and your request for documents related to the case of 6500 Industrial Highway Group vs K.A. Steel Co., Offutt Air Force Base, et al., (H-89-0282 N. D. Ind.). The following information is provided:


A search of the Base Civil Engineering files shows no record of polychlorinated biphenyl (PCB) disposals at the Conservation Chemical Company Site in Gary, Indiana. Several manifests are provided as Attachment 3. It is uncertain whether or not these manifests represent final disposition or disposal locations for the PCB items. If the manifest destinations represent a temporary storage location, it is conceivable that they may have ultimately ended up at the Conservation Chemical Company Site. Offutt AFB does not receive final disposal documents from wastes disposed of through the Defense Reutilization and Marketing Office.

On 30 Mar 90, Ms Shockley contacted Mr Roscoe Davis, Defense Reutilization and Marketing Service (DRMS), Battle Creek, Michigan (616) 961-5922 in reference to their 14 Dec 89, letter (Atch 4) stating that they had no record of hazardous waste disposal contracts with Conservation Chemical Company of Kansas City, Missouri. Mr Davis was asked if hazardous waste disposal contracts reviewed included PCB's. Mr Davis stated that DRMS had searched their contracts by company name, but not by type of hazardous waste. Ms Shockley asked Mr Davis if the review included a record search specifically for the Conservation Chemical Company in Gary, Indiana, as their 14 Dec 89 letter did not address the specific site but the Conservation Chemical Company based out of Kansas City, Missouri. Mr Davis said that if we would like to have him review their files again specifically for PCB disposal at Gary

Indiana Site, we would have to forward such a request in writing (Atch 5).

We believe that together with the information previously provided to the Dallas AFRCE by our Base Legal Office we have exhausted all potential documents associating Offutt Air Force Base with Conservation Chemical Company. Should you need any other assistance in this matter our POC is Johnette Shockley at (402) 294-4087/7621/7619.

Sincerely


JOHN L. POPELKA, J.E.
Deputy Base Civil Engineer

5 Atch

1. EPA Ltr, 30 Jan 89
2. 55 SRW/JA Ltr, 22 Sep 89
3. PCB Manifests
4. DLA Ltr, 14 Dec 89
5. 55 CSG/DDE Ltr, 4 Apr 90

cc: HQ SAC/DEV/JACE
15 AF/DEV/JACE
55 SRW/JA
55 CSG/CC
DRMO XOA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

JAN 8 0 1990

SPS-11

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

OFFUTT AIRFORCE BASE
2902 REAR BUILDING C
OFFUTT AIRFORCE BASE, NE 68133

Re: Request for Information Pursuant to Section 104(e) of CERCLA and Section 3007 of RCRA, for the Conservation Chemical Company Site, in Gary, Indiana.

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) is currently investigating the source, extent and nature of the release or threatened release of hazardous substances, pollutants or contaminants, at the Conservation Chemical Company Site, located at 6500 Industrial Highway, in Gary, Indiana, hereinafter referred to as the "Site". This investigation requires inquiry into the generation, storage, treatment, and disposal of such substances that have been or threaten to be released at the Site. U.S. EPA is also investigating the ability of persons connected with the Site to pay for or perform a clean-up of the Site.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. Section 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), Pub. L. 99-499, and pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6927, you are hereby requested to respond to the Information Requests enclosed. Compliance with the enclosed Information Requests is mandatory. Failure to respond fully and truthfully to each and every Information Request within twenty-five (25) days of receipt of this letter, or to adequately justify such failure to respond, can result in enforcement action by U.S. EPA pursuant to Section 3008 of RCRA under which U.S. EPA may seek the imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of continued noncompliance, and/or pursuant to Section 104(e)(5) of CERCLA which, as amended, authorizes the United States to seek penalties from a Federal Court of up to twenty-five thousand dollars (\$25,000) for each day of continued non-compliance. "Non-compliance" is considered by U.S. EPA to be not only failure to respond to the Requests but also failure to respond completely and truthfully to each Request. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties of up to ten thousand dollars (\$10,000).

or up to five (5) years of imprisonment or both under 18 U.S.C. Section 1001. The U.S. EPA has the authority to use the information requested herein in an administrative, civil or criminal action.

This Information Request is directed to your company, its officers, directors and employees, and its subsidiaries, divisions, facilities and their officers, directors and employees. The relevant time period for this request is 1970 to 1985. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

Your response to this Information Request should be mailed to:

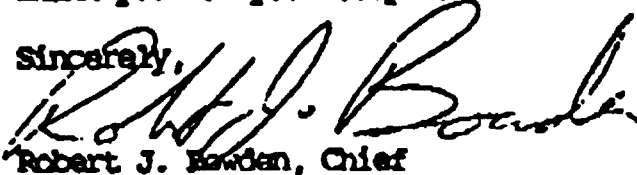
Ruth Mancos
Emergency Support Section
U.S. Environmental Protection Agency, SRS-11 *office of Regional Counsel*
230 South Dearborn Street
Chicago, Illinois 60604

Please direct any questions you may have to Ruth Mancos at (312) 353-3193. If you have any legal questions contact Mary Fulgham at (312) 886-5313.

Due to the seriousness of the problem at the Site and the legal ramifications of your failure to respond promptly and properly, U.S. EPA strongly encourages you to give this matter your immediate attention and to respond to these Information Requests within the time specified above.

Thank you for your cooperation in this matter.

Sincerely,



Robert J. Bowden, Chief
Emergency & Enforcement Response Branch

Enclosure

03/22/90 15:10 271 5554

HQ SAC DE OFFUTT *** AFRCE-CR/ROU

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CONSERVATION CHEMICAL COMPANY, INC.**INSTRUCTIONS**

1. A separate response must be made to each of the questions set forth in this Information Request.
2. Precede each answer with the number of the Information Request to which it corresponds.
3. In answering each Information Request, identify all contributing sources of information.
4. If information not known or not available to the Respondent as of the date of submission of its response should later become known or available, Respondent must supplement its response to U.S. EPA. Moreover, should the Respondent find, at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, respondent must notify U.S. EPA as soon as possible.
5. For each document produced in response to this request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.
6. You must respond to the Information Request on the basis of all information and documents in your possession, custody or control or in the possession, custody or control of your former or current employees, agents, servants, contractors or attorneys. Furnish such information as is available to you, regardless of whether or not it is based on personal knowledge, and regardless of source.
7. Your response should be accompanied by a notarized affidavit from a responsible company official or representative stating that a diligent record search has been completed and that there has been a diligent interviewing process with all present and former employees who may have knowledge of the operations, hazardous substance use, storage, treatment, releases, spills, disposal or handling practices of the Respondent between 1970 to 1985. To the extent that any information you provided relating to these Requests is based on your personal knowledge, or the personal knowledge of your employees, agents, or their representatives, this information shall be in the form of a notarized affidavit.
8. If any documents requested herein have been transferred voluntarily or involuntarily to others or have been otherwise disposed of, identify each such document, identify the person to whom it was transferred, describe the circumstances surrounding such transfer or other disposition, and state the date or approximate date of such transfer or other disposition.

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9. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. 2.203(b). Information covered by such a claim will be disclosed by U.S. EPA only to the extent, and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. [See 41 Federal Register 36902 at 36911 (September 1, 1976); 43 Federal Register 4000 at 3991 (December 18, 1978)]. If no such claim accompanies the information when it is received by U.S. EPA it may be made available to the public by U.S. EPA without further notice to you. You should read carefully the above-cited regulations, together with the standards set forth in Section 104(e)(7) of CERCLA, before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim, as stated in Section 104(e)(7)(ii) of CERCLA.

DEFINITIONS

For the purpose of the Instructions and Requests for Information set forth herein, the following definitions shall apply:

1. The term "you" or "Respondent" shall mean the addressee of the Request, the addressee's officers, managers, employees, contractors, trustees, predecessors, successors, assigns, subsidiaries, and agents.
2. The term "person" as used herein includes, in the plural as well as the singular, any natural person, firm, contractor, unincorporated association, partnership, corporation, trust or governmental entity, unless the context indicates otherwise.
3. "The Site" or "The Facility" shall mean and include the entire property on which the Conservation Chemical Company Site, is located. The Site address is 6500 Industrial Highway, in Gary, Indiana.
4. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, including mixtures of hazardous substances with other substances including petroleum products.
5. The term "pollutant" or "contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA.
6. The terms "furnish", "describe", or "indicate" shall mean turning over to U.S. EPA either original or duplicate copies of the requested information in the possession, custody, or control of the Respondent. Where specific information has not been memorialized in any document but is nonetheless responsive to an information request, you must respond to the request with a written response. If such requested information is not in your possession, custody, or control then indicate where such information or documents may be obtained.

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HQ SAC DE OFFUTT --- AFRCE-CR/ROU

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7. The term "identify" means, with respect to a natural person, to set forth his full name, present or last known business address, the name of that employer and a description of the job responsibilities of such person.

8. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g. corporation, partnership, etc.) organization, if any, and a brief description of its business.

9. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance of the subject matter.

10. "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substances or pollutants or contaminants.

11. As used here, "document" and "documents" shall include writings of any kind, formal or informal, whether or not wholly or partially in handwriting (including by the way of illustration and not by way of limitation), any invoice, receipt, endorsement, check, bank draft, cancelled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements, and the like, diary, calendar, desk pad, scrap book, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc, or disc pack; and any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc or disc pack, tape or other type of memory and together with printouts of such punch card, disc or disc pack, video tape or other type of memory); including (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like of it, (c) drafts, (d) attachments to or enclosures with any documents and (e) every document referred to in any other document.

12. "And" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these Information Requests any information which might otherwise be construed to be outside their scope.

REQUESTS

1. Identify all persons consulted in the preparation of the answers to these Information Requests.
2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests and provide copies of all such documents.
3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.
4. List the EPA Identification Numbers of the Respondent.
5. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom.
6. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances, including but not limited to, AROCLOR 1016, AROCLOR 1221, AROCLOR 1222, AROCLOR 1242, AROCLOR 1248, AROCLOR 1254, AROCLOR 1260, AROCLOR 1268, AROCLOR 1270, AROCLOR 1276, AROCLOR 1280, or any other polychlorinated biphenyl (PCB) by you, your contractors, or by prior owners and/operators.
7. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials, including but not limited to, AROCLOR 1016, AROCLOR 1221, AROCLOR 1232, AROCLOR 1242, AROCLOR 1248, AROCLOR 1254, AROCLOR 1260 or any other (PCB)? If the answer to the preceding question is anything but an unqualified "no", identify:
 - a) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance;
 - b) Who supplied you with such hazardous substances;
 - c) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
 - d) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
 - e) Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
 - f) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

8. Identify all liability insurance policies held by Respondent from 1970 to 1985. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, nonsudden or both types of accidents. In lieu of providing this information, you may submit complete copies of all relevant insurance policies.

9. Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last three years.

10. If Respondent is a Corporation, respond to the following requests:

a) Provide a copy of the Articles of Incorporation and By-Laws of the Respondent.

b) Provide Respondent's financial statements for the past five fiscal years, including, but not limited to those filed with the Internal Revenue Service.

c) Identify all of Respondent's current assets and liabilities and the person who currently own or are responsible for such assets and liabilities.

11. If Respondent is a Partnership, provide copies of the Partnership Agreement.

12. If Respondent is a Trust, provide all relevant agreements and documents to support this claim.



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 55TH STRATEGIC RECONNAISSANCE WING (SAC)
OFFUTT AIR FORCE BASE, NEBRASKA 68113-5000

Johnnie JCS

File 426

JCS

Robert Lefevre
U.S. Department of Justice
Environmental Defense Section
Room 7113
Washington, D.C. 20530

22 September 1989

Dear Mr Lefevre

In response to our phone conversation of 20 September 1989 and your request that I address the request to produce documents in the case of 6500 Industrial Highway Group vs. K.A. Steel Co., Offutt Air Force Base, et al., (H-89-0282 N. D. Ind.), I have attached all of the documents I have found at Offutt Air Force Base, Nebraska. A description of each document follows. I obtained these documents from the files of Offutt Air Force Base Environmental Engineering Division and files at our Base Legal Office.

Atch 1--A list of facilities available for waste disposal supplied to Offutt Air Force Base. Conservation Chemical Company (CCC) is highlighted. Mr Ed Lueninghoener, Chief, Environmental and Contract Planning Section of 55 Combat Support Group Environmental Engineering Division, believes this was sent to Offutt Air Force Base in response to a request for names of potential disposal sights, probably in the late 70's. His phone number is (402) 294-4087.

Atch 2--A 27 Sep 85, EPA Region V Section 106 Administrative Order with cover letter.

Atch 3--A 22 Nov 85, EPA Region V Supplemental Administrative Order.

Atch 4--A 9 Mar 87, letter to Offutt Air Force Base, from the 6500 Industrial Highway Group notifying us of a meeting of PRPs in Chicago.

Atch 5--A 16 Mar 87, letter from a former attorney at the Base Legal Office, notifying the Base Environmental Engineering Division at Offutt Air Force Base of our potential CERCLA liability. Attached to it is the 9 Mar 87 letter referred in the above paragraph.

Atch 6--A 13 Apr 87, follow-up letter from the same attorney at the Base Legal Office to Base Environmental Engineering. This is a cover letter with two attachments:

(1) A 27 Mar 87, report of trip to the PRP meeting in Chicago prepared by our Air Force Regional Civil Engineer Counsel, Major Whittington. Major Whittington attended the meeting on 25 Mar 87 concerning this case.

(2) The results of a computer run performed by Tech Law of Denver, Colorado, showing record summaries of Offutt Air Force Base's shipments to CCC. These summaries do not distinguish whether shipments were actually made to the Gary, Indiana site or to CCC's Kansas City, Missouri outlet.

Atch 2

Atch 7--A 23 Apr 87, letter from Base Environmental Engineering to the Base Legal Office in response to the above 13 Apr 87 letter. This letter reports the results of a record search by Base Environmental Engineering. There are 6 attachments to this 23 Apr 87 letter:

(1) A 8 Mar 87, letter from Base Environmental Engineering to the Contracting Division requesting a service contract for hazardous waste disposal recommending CCC in Kansas City, Missouri as a source.

(2) A 23 Feb 79, letter from Offutt Air Force Base's Biomedical Engineering Division to Environmental Engineering Division, listing materials for disposal.

(3) and (4) Two, 30 Nov 78, documents showing Offutt Air Force Base's shipment and disposal of chemicals using CCC in Kansas City, Missouri as contractor.

(5) and (6) A 14 Nov 78 letter from Environmental Engineering to Base Environmental Engineering Division requesting a service contract for disposal of hazardous chemicals and materials. Atch 6 is a listing of these materials.

Atch 8--A 7 May 74, letter from Base Environmental Engineering to Base Contracting requesting a contract for disposal of waste chemicals. CCC is the recommended source for this contract.

In addition to performing a record search of Environmental Engineering, I contacted Ms Laurel Walker, Contracting Officer at Offutt Air Force Base's Contracting Office, (402) 294-6005; Captain Randall M. Boyce, Biomedical Engineering Division, (402) 294-6372; and Mr Jon Howery at Offutt Air Force Base's Defense Reutilization and Marketing Organization (DRMO), (402) 294-3934. I requested similar record searches from these persons and nothing on CCC was produced. The Contracting Office keeps records three years and then sends them to an archive managed by our Directorate of Administration. Apparently the only way to trace specific contracts in the archives is by contract number; there is no way to retrieve them by subject or contractor name; however, I have asked for a full archive search if this can be accomplished with the data we have. The DRMO has records back to 1983. Mr John L. Howery, the Hazardous Property Processor, at (402) 294-3934, searched all manifests, contracts, and sales records and found nothing on CCC. None of the people I spoke with recognized the name Conversation Chemical Company with the exception of Mr Lueninghoener, at Base Environmental Engineering. Mr Lueninghoener did not recall any specifics about CCC except that we did use them for disposal in the past.

Following this, I contacted the following agencies and personnel:

1. DRMO Regional Office, 926 Taylor Station Road, Blacklick, Ohio 43004-9615. Ms Shari McPherson, Contracting Division, at (614) 238-2171 indicated that copies of contracts for hazardous waste shipment from Offutt Air Force Base are sent to the DRMO Regional Office but are not maintained once the contract is completed. She referred me to their headquarters in Michigan. (She did not recognize Conversation Chemical Company either.)

2. DRMO Headquarters, 74 North Washington Street, Battle Creek, Michigan 49015. I spoke with Mr Roscoe Davis, an environmental specialist in the Office of the Directorate of Environmental Protection. (I was referred to him by the DRMO Headquarters Hazardous Waste Division.) Mr Davis agreed to initiate a records search of all documents from Offutt Air Force Base related to CCC. He indicated such a search could take a few weeks, up to one month. His phone number is (616) 961-5922.

Our Air Force Regional Civil Engineering Counsel, Lt Col Lee Zimmerman, informed me that Tech Law of Denver may be able to perform a record search also and someone from Tech Law may contact me next week concerning this.

I believe the foregoing exhausts all potential sources for documents linking Offutt Air Force Base to CCC. Please let me know if you have questions or suggestions as to how you wish me to proceed. Our datafax number is (402) 294-4189, if you want to datafax your draft answer to the complaint as we discussed.

Sincerely

Laura E. Carlan

LAURA E. CARLAN, Capt, USAF
Chief, Environmental Law Division

I concur.

Glenn J. Gamboa

GLENN J. GAMBOA, Lt Col, USAF
Staff Judge Advocate

7 Atch

1. Facilities Available to Missouri For Disposal Or Treatment Of Hazardous Waste
2. U.S. EPA Regn 5 Ltr, 27 Sep 85
3. U.S. EPA Regn 5 Section 6 Order
4. 6500 Industrial Highway Group Ltr, 9 Mar 87
5. 55 CSG/JA Ltr, 16 Mar 87
6. 55 CSG/JA Ltr, 13 Apr 87
7. 55 CSG/DEEV Ltr, 23 Apr 87
8. 55 CSG/DEEV Ltr, 7 May 74

UNIFORM HAZARDOUS WASTE MANIFEST		21. Generator's US EPA ID No NE 8571924648		Manifest Document No 1956		2. Page 1 of 1 Information in the shaded area is not required by Federal law.	
3. Generator's Name and Mailing Address OFFUTT AFB DPDO F PO BOX 13292 68113 OFFUTT AFB MO 64102 294 4964						A. State Manifest Document Number	
						B. State Generator's ID SAME	
4. Generator's Phone						C. State Transporter's ID	
5. Transporter 1 Company Name PCB INC OF MISSOURI						D. Transporter's Phone 816 221 3660	
6. US EPA ID Number MOD 980633044						E. State Transporter's ID	
7. Transporter 2 Company Name						F. Transporter's Phone	
8. US EPA ID Number						G. State Facility's ID	
9. Designated Facility Name and Site Address PCB INC OF MISSOURI 2100 WYANDOTTE KANSAS CITY MO 64108						H. Facility's Phone 816 221 3660	
10. US EPA ID Number MOD 980633044							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers	
						No.	Type
a. (RQ) WASTE POLYCHLORINATED BIPHENYL ORME UN2315						9	CW
b. (RQ) WASTE POLYCHLORINATED BIPHENYL ORME UN2315						4	DM
c.							
d.							
13. Total Quantity						14. Unit Wt/Vol	15. Waste No.
33825						P	
FSTR						P	
3088						P	
J. Additional Descriptions for Materials Listed Above A TRANSFORMERS B PBC OIL						K. Handling Codes for Wastes Listed Above A B L B B	
15. Special Handling Instructions and Additional Information <div style="text-align: right; font-size: 1.5em;">EOUT. CONT 0098</div>							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.							
Printed/Typed Name DONALD STALWICK						Signature <i>Donald T. Stalwick</i>	
17. Transporter 1 Acknowledgement of Receipt of Materials						Date 3 21 85	
Printed/Typed Name JERRY SIMMERS						Signature <i>Jerry Summers</i>	
18. Transporter 2 Acknowledgement of Receipt of Materials						Date 3 21 85	
Printed/Typed Name						Signature	
19. Discrepancy Indication Space						Date	
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						Date	
Printed/Typed Name PCB INC OF MO. LALAND HICKMAN						Signature <i>Laland Hickman</i>	
						Date 03 22 85	



HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Form Approved. OMB No. 2000-0404. Expires 7-31-02

Please print or type.

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA No.

Manifest
Document No.

2. Page 1

Information in the shaded areas
is not required by Federal law.

3. Generator's Name and Mailing Address

A. State Manifest Document No.

NY A 159316-2

B. State generator's ID

SAME

4. Generator's Phone (402) 294-4904

6. US EPA ID Number

C. State Transporter's ID

OK/2004

5. Transporter 1 (Company Name)

D. Transporter's Phone (800) 654-8930

US POLLUTION CONTROL

2001 CLASSEN CTR.

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

10. US EPA ID Number

G. State Facility's ID

H. Facility's Phone

NATIONAL ELECTRIC CORP

COFFEYVILLE IND. PARK

COFFEYVILLE, KS 67337

N/A

316-251-6380

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

12. Containers

13. Total

14. Unit

15. Waste No.

a. (RA)

WASTE PCB XFORMERS >500ppm - ORM-E - 2315 UN

No.

Type

Quantity

Wt/Vol

Waste No.

b. (RA)

WASTE PCB DEBRIS >500ppm/ORM-E - 2315 UN

c. (RA)

WASTE PCB OIL >500ppm/ORM-E - 2315 UN

d. (RA)

WASTE PCB CAPACITORS >500ppm/ORM-E - 2315 UN

J. Additional Descriptions for Materials listed Above

K. Handling Codes for Wastes Listed Above

a

c

a

c

b

d

b

d

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and state laws and regulations.

DATE

Printed/Typed Name

Signature

Month Day Year

DONALD T. STALWICK

Donald T. Stalwick

Month Day Year

17. Transporter 1 (Acknowledgement of Receipt of Materials)

DATE

Printed/Typed Name

Signature

Month Day Year

HOWARD BURDEN

Howard Burden

09.28.04

18. Transporter 2 (Acknowledgement or Receipt of Materials)

DATE

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

DATE

Printed/Typed Name

Signature

Month Day Year

SC 11/11

SC 11/11

11.09.04

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please print or type.

Form Approved. OMB No. 2000-0404. Expires 12/31/99

9210

UNIFORM HAZARDOUS WASTE MANIFEST 1. Generator's US EPA No. <u>NE 857-192-16481</u> 0000		Manifest Document No. <u>0000</u>		2. Page <u>1</u> of <u>2</u>		Information in the shaded area is not required by Federal Law.																																				
3. Generator's Name and Mailing Address <u>DPDO OFFUTT AIR FORCE BASE</u> <u>BLDG 553 / PO BOX 13242</u> <u>OMAHA, NE 68113</u>				A. State Manifest Document No. <u>NYA 159315 3</u>																																						
4. Generator's Phone <u>402-294-4904</u>				B. State generator's ID <u>SAME</u>																																						
5. Transporter 1 (Company Name) <u>US POLLUTION CONTROL</u> <u>2001 CLASSEN CTR.</u> <u>OKLAHOMA CITY, OK 73106</u>				C. State Transporter's ID <u>OK 12004</u>																																						
6. US EPA ID Number <u>KT 410010466</u>				D. Transporter's Phone <u>800</u> <u>654-8330</u>																																						
7. Transporter 2 (Company Name)				E. State Transporter's ID																																						
8. US EPA ID Number				F. Transporter's Phone ()																																						
9. Designated Facility Name and Site Address <u>NATIONAL ELECTRIC CORP</u> <u>COFFEYVILLE IND PARK</u> <u>COFFEYVILLE, KE 67327</u>				10. US EPA ID Number <u>N/A</u>																																						
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No.</th> <th>Type</th> <th>13. Total Quantity</th> <th>14. Unit Wt/Vol</th> <th>15. Waste No.</th> </tr> </thead> <tbody> <tr> <td>a. (20)</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="5">WASTE PCW FILTER 500PPM / ORN-E-2315001 DM 0.0.18 P</td> </tr> <tr> <td>b. (20)</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="5">WASTE PCW TRANSFORMER 50-500 / ORN-E-2315002 CM 0.18.00 P</td> </tr> <tr> <td>c.</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>d.</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		No.	Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.	a. (20)					WASTE PCW FILTER 500PPM / ORN-E-2315001 DM 0.0.18 P					b. (20)					WASTE PCW TRANSFORMER 50-500 / ORN-E-2315002 CM 0.18.00 P					c.					d.					16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and state laws and regulations.	
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GENERATOR

TRANSPORTER

FACILITY

NYA 159315 3



ALABAMA HAZARDOUS WASTE MANIFEST

CWMA
NO 54608

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
REPORTER Environmental International Critical Services Inc.	Kansas City, Ks 66115 3126 Brinkerhoff Rd.	913-321-3155	K S D 9 8 0 6 8 8 7 3 3
REPORTER NO. 1	2720 Royal Lane		X D 0 0 7 9 3 4 1 6 3
1E D.C.	Dallas TX 75229		
REPORTER NO. 2			
DISPOSER Chemical Waste Management, Inc. Emelle Facility	P. O. Box 55 Emelle, Alabama 35459	205-652-9531	A L D O O O 6 2 2 4 6 4

WASTE INFORMATION

CONTAINER	DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.	C.W.M.A. WASTE CODE	WEIGHT	
ID.	TYPE						
3	Drums	Waste, Poly-Chlorinated Biphenyls Solid waste drums	UN2315	48	DR		

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531 ; GENERATOR — (913) 321-3155 US COAST GUARD 1-800-424-8802

SPECIAL INSTRUCTIONS:

CERTIFICATION

I hereby certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

J. Herbert
Generator

President
Title

1-3-84
Date

I hereby certify acceptance of the hazardous waste shipment described above:

L. G. Pinkerton
Transporter #1

Driver
Title

1-3-84
Date

Transporter #2

Title

Date

I hereby certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

Dwayne King
Disposer

Env. Sci. Tech
Title

1-6-84
Date

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	
	48	59 9A1	D81	20			0% taxable



ALABAMA

PCB

CWMA

HAZARDOUS WASTE MANIFEST

No 46728

IDENTIFICATION INFORMATION

NAME	ADDRESS	PHONE	EPA ID CODE
GENERATOR	PO Box 13292	402	
REPORTER NO. 1	OMAHA, NE 68113	294-3934	N E 8 5 7 1 9 2 4 6 4 8
REPORTER NO. 2	PO Box 55	205	
EMELLE, AL		652-9531	A L D 0 0 0 6 2 2 4 6 4
DISPOSER			
Chemical Waste Management, Inc.	P. O. Box 55	205-652-9531	A L D 0 0 0 6 2 2 4 6 4
Emelle Facility	Emelle, Alabama 35459		

WASTE INFORMATION

CONTAINER	DESCRIPTION/CLASS	TOTAL QUAN.	UNIT	EPA Hazardous Waste ID No.	CWMA WASTE CODE	WEIGHT
O. TYPE	UN 2315					
	PCB TRANSFORMER, OVER 500 PPM, DRAWN BUT NOT FLUSHED, SER # 6553922, 6717230, D548726, D54872061P, 25B0601001.	5	EA			
55 gal drum	PCB LIQUID, OVER 500 PPM	6	DR			
	PCB CAPACITORS	4	EA			

EMERGENCY INFORMATION

EMERGENCY NOS.: DISPOSER — (205) 652-9531; GENERATOR — (402) 294-3934 US COAST GUARD 1-800-424-8802

SPECIAL INSTRUCTIONS:

CERTIFICATION

I am to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency:

Donald T. Stelrich
GeneratorProperty Disposal Office
Title
6 Oct. 1982
Date

I am to certify acceptance of the hazardous waste shipment described above:

D. Coleman
Transporter #1Drew
Title
10-6-1982
Date

Transporter #2

I am to certify acceptance of the hazardous waste shipment described above for treatment, storage or disposal:

Ass't Rec Sup
DisposerAss't Rec Sup
Title
10-18-82
Date

DISPOSAL INFORMATION

CWMA WASTE CODE	QUANTITY	UNIT	PROCESS CODE	LOCATION			COMMENTS
				TRENCH	LEVEL	QUAD	
5A	5	Trans	DB1	14			141 total gallons for 5 transformers we flushed
22 F	6	55 gal	S01	Inc	skip		5 Trans: 69.77 ft ³

UNIFORM HAZARDOUS WASTE MANIFEST		21. Generator's US EPA ID No. NE 8571924648		Manifest Document No. 2213		2. Page 1 of 1 Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address OFFUTT DPO PO BOX 13292 OFFUTT: NE 68113						A. State Manifest Document Number	
4. Generator's Phone (402) 294 4964						B. State Generator's ID	
5. Transporter 1 Company Name CHICAGO INDUSTRIAL WASTE HAULERS						C. State Transporter's ID 18969511	
6. Transporter 1 US EPA ID Number IND 980794960						D. Transporter's Phone 312 297 3000	
7. Transporter 2 Company Name						E. State Transporter's ID	
8. Transporter 2 US EPA ID Number						F. Transporter's Phone	
9. Designated Facility Name and Site Address PCB INC. OF MISSOURI 2100 WYANDOTTE KANSAS CITY, MO 64108						G. State Facility's ID	
10. US EPA ID Number MOD 980633044						H. Facility's Phone 816 221 3660	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers	
						No.	Type
a. (RQ) WASTE POLYCHORINATED BIPHENYLS ORM-E UN2315						1	DM 270 P
b. (RQ) WASTE POLYCHORINATED BIPHENYLS ORM-E UN2315						4	CM 6190 P
c. (RQ) WASTE POLYCHORINATED BIPHENYLS ORM-E UN2315						2	EM 14 P
d.							
J. Additional Descriptions for Materials Listed Above A OIL B TRANSFORMER C CAPACITOR						K. Handling Codes for Wastes Listed Above A - B B - BL C - BL	
15. Special Handling Instructions and Additional Information <div style="text-align: right; font-size: 1.2em;">GOUT. CONT 0147</div>							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.							
Printed/Typed Name Donald T. STALWICK						Signature <i>Donald T. Stalwick</i>	
						Date 6/6/85	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name O'DELL NEALS						Signature <i>P. O'Dell Neals</i>	
						Date 6/6/85	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name						Signature	
						Date	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name PCB INC. LAUAN HICKMAN						Signature <i>Lauren Hickman</i>	
						Date 06/07/85	



DEFENSE LOGISTICS AGENCY
DEFENSE REUTILIZATION AND MARKETING SERVICE
FEDERAL CENTER
74 N. WASHINGTON
BATTLE CREEK, MI 49017-3092



DEC 14 1988

IN REPLY
REFER TO

DRMS-HTA (Mr. R. Davis/(616)961-5922/mm)

SUBJECT: Offutt Air Force Base

TO: 55 SRW/JA
ATTN: Captain Albert Kline
Offutt AFB, NV 68113-5000

1. We have completed a review of Defense Logistics Agency (DLA) hazardous waste disposal contracts servicing Offutt AFB and found no contracts involving Conservation Chemical Company of Kansas City, MO.
2. Should you need any other assistance in this matter, please contact Mr. Roscoe Davis, DRMS-HTA, (AV)932-5922 or commercial area code (616) 961-5922.

FOR THE COMMANDER:

E. L. WILLIAMS, JR.
Colonel, USAF
Director of Environmental Protection



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 55TH COMBAT SUPPORT GROUP (SAC)
OFFUTT AIR FORCE BASE, NEBRASKA 68113-5000




REPLY TO: DEE
ATTN. OF:

4 APR 1990

SUBJECT: Request for Information Pursuant to Section 104(e) of CERCLA, and
Section 3007 of RCRA, for the Conservation Chemical Company (CCC)
Site, in Gary, Indiana.
TO: Colonel E. L. Williams, Jr.
Defense Reutilization and Marketing Service
Federal Center
74 N. Washington
Battle Creek, Michigan 49018-3092

1. Reference your 14 Dec 89 Letter regarding Offutt Air Force Base.
2. We have received a request for information from EPA Region V on our involvement with polychlorinated biphenyl (PCB) disposals at a CCC site located in Gary, Indiana.
3. A search of the Base Civil Engineering files shows no record of PCB disposals at the CCC Site in Gary, Indiana. Several manifests for PCB disposals through our local Defense Reutilization and Marketing Office have been discovered and are provided as Attachment 1. It is uncertain whether or not these manifests represent final treatment or disposal locations for the PCB items. If the manifest destinations represent a temporary storage location, it is conceivable that they may have ultimately ended up at the Conservation Chemical Company Site. Offutt AFB does not receive final disposal documents from wastes disposed of through the Defense Reutilization and Marketing Office.
4. On 30 Mar 90, Ms Shockley contacted your Mr Roscoe Davis, Defense Reutilization and Marketing Service (DRMS), Battle Creek, Michigan (616) 961-5922 in reference to your 14 Dec 89 letter stating that you had no record of hazardous waste disposal contracts with Conservation Chemical Company of Kansas City, Missouri. Mr Davis was asked if hazardous waste disposal contracts reviewed included a search for PCB disposals. Mr Davis stated that DRMS had searched their contracts by company name not by type of hazardous waste. Ms Shockley asked Mr Davis if the review included a record search specifically for the Conservation Chemical Site in Gary, Indiana, as their 14 Dec 89 letter did not address the specific site but the Conservation Chemical Company based out of Kansas City, Missouri.

5. Request you review your files again specifically for PCB disposals at the Gary Indiana CCC Site. Your assistance in this matter is greatly appreciated.


JOHN L. POPELKA, P.E.
Deputy Base Civil Engineer

1 Atch
Manifest

cc: HQ SAC/DEV/JACE
15 AF/DEV/JACE
55 SRW/JA
55 CSG/CC